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10 *Attorneys for Defendants, BAC Home Loans Servicing, LP fka Countrywide Home Loans*  
11 *Servicing, LP and Carrington Mortgage Services*

12 **UNITED STATES DISTRICT COURT**  
13 **DISTRICT OF NEVADA**

14 RJRN HOLDINGS LLC,

15 Plaintiff,

16 vs.

17 RHONDA DAVIS; BAC HOME LOANS  
18 SERVICING, LP, FKA COUNTRYWIDE  
19 HOME LOANS SERVICING, LP;  
20 CARRINGTON MORTGAGE SERVICES;  
21 HACIENDA NORTH HOMEOWNERS'  
22 ASSOCIATION; and DOES 1 through 10,  
23 inclusive; ROE CORPORATIONS 1 through  
24 10, inclusive,

25 Defendants.

Case No.:

**PETITION FOR REMOVAL OF ACTION**

26 **TO: THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA:**

27 Pursuant to 28 U.S.C. §§ 1441 and 1446, Defendants BAC Home Loans Servicing, LP  
28 fka Countrywide Home Loans Servicing, LP ("BAC") and Carrington Mortgage Services  
("Carrington"), (collectively hereinafter "Defendants"), by and through its counsel of record,  
Dana Jonathon Nitz, Esq. and Victoria L. Hightower, Esq., of the law firm of Wright, Finlay &  
Zak, LLP, hereby removes this action to the United States District Court for the District of  
Nevada, and in support thereof, state as follows:

1. The above-entitled action was commenced on or about June 16, 2015, in the  
Eighth Judicial District Court for the State of Nevada in and for the County of Clark ("State

1 Court”) under the designated Case Number A-15-720000-C (the “State Court Action”). Plaintiff  
2 named BAC and Carrington as Defendants, among other defendants.

3 2. Plaintiff’s Complaint in the State Court Action asserts claims for declaratory  
4 relief/quiet title, preliminary and permanent injunction and slander to title, against Defendants,  
5 concerning the real property located at 5234 Fire Night Ave., Las Vegas, NV 89122, APN: 161-  
6 28-316-025.

7 3. The ground for this removal is federal question jurisdiction. Pursuant to 28  
8 U.S.C. 1331, “[t]he district courts shall have original jurisdiction of all civil actions arising under  
9 the Constitution, laws, or treaties of the United States.” The Property at issue in this matter is  
10 secured by a Deed of Trust concerning a Federal Fair Housing Act (“FHA”) loan, and is  
11 therefore governed by federal law.

12 4. This removal is timely. The Petition is timely because it does not appear that the  
13 Defendants have been properly served with the summons and complaint, and the statutory period  
14 of time in which to remove this case has not yet begun to run. Defendants discovered this action  
15 or about June 16, 2015 and even measured from that date, the Petition for Removal is timely.

16 5. One year has not elapsed from the date the action in state court commenced.

17 6. Venue is proper in the unofficial Southern Division of the District pursuant to 28  
18 U.S.C. § 1441(a) because this District embraces the place where the state court action is  
19 pending.

20 7. Pursuant to 28 U.S.C. § 1446(a), Defendants have annexed all process, pleadings,  
21 and Orders served and not served upon them, which are annexed hereto as **Exhibit “A.”**

22 8. Pursuant to 28 U.S.C. § 1441(c), a true copy of the original Petition for Removal  
23 has been filed concurrently with the Eighth Judicial District Court, Clark County, Nevada and  
24 served upon the Plaintiff in this case.

25 9. Defendants reserve the right to supplement this Petition for Removal when  
26 additional information becomes available. Defendants further reserve all rights including, but not  
27 limited to, defenses and objections as to venue, personal jurisdiction, and service. The filing of  
28 this Petition for Removal is subject to and without waiver of any such defense or objection.

DATED this 2<sup>nd</sup> day of July, 2015.

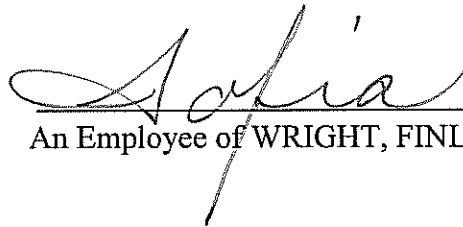
*Handwritten signature: H. J. J. J. J.*

- 3 -

**CERTIFICATE OF MAILING**

I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP; that service of the foregoing **PETITION FOR REMOVAL OF ACTION** was made on the 2 day of July, 2015, by depositing a true copy of same in the United States Mail, at Las Vegas, Nevada, addressed as follows:

Michael Beede, Esq.  
2300 W. Sahara Ave. #420  
Las Vegas, NV 89102  
*Attorney for Plaintiff*



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An Employee of WRIGHT, FINLAY & ZAK, LLP